

17-202107

**McCABE, WEISBERG & CONWAY, LLC**

**By: Alexandra T. Garcia, Esq., (Atty. I.D. # ATG4688)**

**216 Haddon Avenue, Suite 201**

**Westmont, NJ 08108**

**(856) 858-7080**

Attorneys for Movant: U.S. Bank National Association, as Trustee, successor in Interest to Wilmington Trust Company, as Trustee, successor in Interest to Bank of America National Association, as Trustee, successor by Merger to LaSalle Bank National Association, as Trustee for Lehman XS Trust Mortgage Pass-Through Certificates, Series 2007-6

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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY

**Camden Vicinage**

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IN RE: Kenneth E. Wright aka Kenneth  
Wright dba The Wood Doctor

Debtor

Case No.: 18-15336-JNP

Chapter: 13

Judge: Jerrold N. Poslusny Jr.

NOTICE OF MOTION FOR RELIEF FROM  
THE AUTOMATIC STAY

TO:

Kenneth E. Wright  
432 West Avenue  
Ocean City , New York 08226

U.S. Trustee  
US Dept of Justice  
Office of the US Trustee  
One Newark Center Ste 2100  
Newark, NJ 07102

Isabel C. Balboa  
Chapter 13 Standing Trustee  
Cherry Tree Corporate Center  
535 Route 38- Suite 580  
Cherry Hill, New Jersey 08002

DEAR SIRS AND MADAMS:

PLEASE TAKE NOTICE that on June 19, 2018 at 10:00a.m., or as soon as counsel may be heard, the undersigned attorney for the secured creditor, **U.S. Bank National Association, as Trustee, successor in Interest to Wilmington Trust Company, as Trustee, successor in Interest to Bank of America National Association, as Trustee, successor by Merger to LaSalle Bank National Association, as Trustee for Lehman XS Trust Mortgage Pass-**

**Through Certificates, Series 2007-6**, will move before the United States Bankruptcy Court, District of New Jersey, for an Order Vacating the Automatic Stay with respect to property known as 434 West Avenue, Ocean City, New Jersey 08226, to continue with its state Court remedies to recover possession of the Property.

PLEASE TAKE FURTHER NOTICE that if you wish to contest this motion, you must file a written response with the Clerk of the Bankruptcy Court and serve a copy of the responding papers upon the undersigned at least seven (7) days before the date of the hearing.

PLEASE TAKE FURTHER NOTICE that the moving party avers that no brief is necessary as the matter does not involve complex legal issues.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby waives oral argument and relies upon the Certifications in support of this motion unless the matter is contested.

Date: May 16, 2018

McCABE, WEISBERG & CONWAY, LLC

/s/ Alexandra T. Garcia  
Alexandra T. Garcia, Esquire